

Granted.

10:13 AM, Jul 27, 2022

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case No. 1:21-mj-501
	:	
Plaintiff,	:	Magistrate Judge Litkovitz
	:	
v.	:	
	:	
TAMIKA DOUGLAS,	:	
	:	
Defendant.	:	



UNOPPOSED MOTION FOR REMOVAL FROM SUPERVISION

Defendant Tamika Douglas respectfully asks this Court to grant her motion to remove her from the supervision of pre-trial services.

Sincerely,

/s/ Stephanie F. Kessler

STEPHANIE F. KESSLER (0092338)
Pinales, Stachler, Young & Burrell Co., LPA
455 Delta Ave., Suite 105
Cincinnati, Ohio 45226
(513) 252-2733
(513) 252-2751
skessler@pinalesstachler.com

Attorney for Defendant Tamika Douglas

MEMORANDUM IN SUPPORT

Ms. Douglas was arrested on a complaint on June 22, 2021. On July 8, 2021, Ms. Douglas waived her right to be indicted within thirty days from the date of her arrest. (See Waiver of Indictment, Doc. 17). On June 23, 2021, Ms. Douglas was released under conditions set by this Court, which included electronic monitoring, a curfew, and other conditions to be monitored by the Pre-Trial Services Office. On July 17, 2021, this Court granted Ms. Douglas' *Emergency Motion to Remove Ankle Monitor* as she had secured new employment and was concerned that the ankle monitor would cause her potential new employer to rescind her job offer. Ms. Douglas has subsequently adhered to all of the conditions mandated by this Court's June 23, 2021, order to the satisfaction of her Pre-Trial Services officer.

Mr. Campbell expressed his positive feedback for Ms. Douglas in a July 13, 2022 email to defense counsel in which he stated, "Needless to say, Ms. Douglas is doing great and she has been testing negative, has maintained employment and has successfully completed counseling."

While Ms. Douglas has successfully balanced her employment responsibilities with the responsibilities she has under the release conditions set by this Court a year ago, it has been difficult for her to take the time off work regularly to make all of the appointments that she is mandated to attend under the order. The employment opportunities available to an individual with Ms. Douglas' qualifications do not typically allow her the sick/vacation time necessary to miss work regularly, threatening the stability of her life and employment as she passes the one-year mark since her arrest and conditional release with no end in sight.

The Government is unopposed to this motion.

CONCLUSION

In consideration of Ms. Douglas' stellar performance under the mandated conditions of her release over the past year, the ongoing burden on Ms. Douglas' stability of life and employment, and the substantial caseload of pre-trial services officers, Ms. Douglas respectfully asks this Court to remove her from the supervision of pre-trial services.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via this Court's electronic filing system on all counsel of record on this 26th day of July, 2022.

/s/ Stephanie F. Kessler

STEPHANIE F. KESSLER (0092338)